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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION**

UNITED STATES OF AMERICA

Criminal No.

M-12-1639

JESUS CASIMIRO MIRELES
ELIDA MIRELES
RAMIRO ARREDONDO SALINAS
ELIZABETH AGUILAR
KATIE MAY ZAMORA
FRANCIS ANAHI RUBIO
RODOLFO RIOS
DEBBIE DEBBLES VELAZQUEZ

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10/17/2012/2c

**INDICTMENT**

## THE GRAND JURY CHARGES:

**Count One**

From on or about November 10, 2010, to on or about November 29, 2010, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**JESUS CASIMIRO MIRELES**

knowingly made a false statement with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory of McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Century International Arms, Model WASR 10, 7.62mm rifle, serial number 1977DL2785; a Century International Arms, Model WASR 10, 7.62mm rifle, serial number AG66821989; and a Century International Arms, Model WASR 10, 7.62mm rifle, serial number 1967AD4258 in that defendant **JESUS CASIMIRO MIRELES** falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473 that defendant **JESUS CASIMIRO**

**MIRELES** was the actual buyer of the firearms described above, when in truth and fact, the defendant **JESUS CASIMIRO MIRELES** knew that those statements and representations were false and that defendant **JESUS CASIMIRO MIRELES** was not the actual buyer of the firearms.

In violation of Title 18, United States Code, Section 924(a)(1)(A).

**Count Two**

From on or about December 3, 2010, to on or about December 31, 2010, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**JESUS CASIMIRO MIRELES**

knowingly made a false statement with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory of McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Century International Arms, Model M70AB2T, 7.62mm rifle, serial number AB2T-N102988; a Century International Arms, Model WASR 10, 7.62mm rifle, serial number 1970BT0515; a Century International Arms, Model M70AB2T, 7.62mm rifle, serial number AB2T-N102699; and a Century International Arms, Model AKMS, 7.62mm rifle, serial number KMS00994 in that defendant **JESUS CASIMIRO MIRELES** falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that defendant **JESUS CASIMIRO MIRELES** was the actual buyer of the firearms described above, when in truth and fact, the defendant **JESUS CASIMIRO MIRELES** knew that those statements and representations were false and that defendant **JESUS CASIMIRO MIRELES**, was not the actual buyer of the firearms.

In violation of Title 18, United States Code, Section 924(a)(1)(A).

**Count Three**

From on or about January 5, 2011, to on or about January 31, 2011, in the Southern District of Texas and within the jurisdiction of the Court, defendant

**JESUS CASIMIRO MIRELES**

knowingly made a false statement with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory of McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Century International Arms, Model WASR 10, 7.62mm rifle, serial number 1968BF2073; a Century International Arms, Model WASR 10, 7.62mm rifle, serial number 1986RB7054; a Century International Arms, Model AKMS, 7.62mm rifle, serial number KMS01153; and a Century International Arms, Model AKMS, 7.62mm rifle, serial number KMS01081 in that the defendant **JESUS CASIMIRO MIRELES**, falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that defendant **JESUS CASIMIRO MIRELES** was the actual buyer of the firearms described above, when in truth and fact, defendant **JESUS CASIMIRO MIRELES** knew that those statements and representations were false and that defendant **JESUS CASIMIRO MIRELES** was not the actual buyer of the firearms.

In violation of Title 18, United States Code, Section 924(a)(1)(A).

**Count Four**

From on or about February 1, 2011, to on or about February 3, 2011, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**JESUS CASIMIRO MIRELES**

knowingly made a false statement with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory of McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Century International Arms, Model WASR 10, 7.62mm rifle, serial number 1969BO3632; and a Century International Arms, Model M70AB2T, 7.62mm rifle, serial number AB204966 in that the defendant **JESUS CASIMIRO MIRELES** falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that defendant **JESUS CASIMIRO**

**MIRELES** was the actual buyer of the firearms described above, when in truth and fact, defendant **JESUS CASIMIRO MIRELES** knew that those statements and representations were false and that defendant **JESUS CASIMIRO MIRELES** was not the actual buyer of the firearms.

In violation of Title 18, United States Code, Section 924(a)(1)(A).

**Count Five**

From on or about October 13, 2010, to on or about October 29, 2010, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**ELIDA MIRELES**

knowingly made a false statement with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory of McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Century International Arms, Model WASR 10, 7.62mm rifle, serial number 1968BH3310; a Century International Arms, Model WASR 10, 7.62mm rifle, serial number 1965NI0307; and a Century International Arms, Model WASR 10, 7.62mm rifle, serial number 1982SAD4183 in that the defendant **ELIDA MIRELES** falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that defendant **ELIDA MIRELES** was the actual buyer of the firearms described above, when in truth and fact, defendant **ELIDA MIRELES** knew that those statements and representations were false and that defendant **ELIDA MIRELES** was not the actual buyer of the firearms.

In violation of Title 18, United States Code, Section 924(a)(1)(A).

**Count Six**

From on or about November 8, 2010, to on or about November 26, 2010, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**ELIDA MIRELES**

knowingly made a false statement with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory of McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Century International Arms, Model AKMS, 7.62mm rifle, serial number KMS00157; a Century International Arms, Model WASR 10, 7.62mm rifle, serial number 1979ZE2245; a Century International Arms, Model WASR 10, 7.62mm rifle, serial number 1969BP0546; and a Century International Arms, Model AKMS, 7.62mm rifle, serial number KMS00344 in that the **ELIDA MIRELES** falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that defendant **ELIDA MIRELES**, was the actual buyer of the firearms described above, when in truth and fact, defendant **ELIDA MIRELES** knew that those statements and representations were false and that defendant **ELIDA MIRELES** was not the actual buyer of the firearms.

In violation of Title 18, United States Code, Section 924(a)(1)(A).

**Count Seven**

From on or about December 3, 2010, to on or about December 31, 2010, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**ELIDA MIRELES**

knowingly made a false statement with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory of McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Century International Arms, Model M70AB2T, 7.62mm rifle, serial number AB2T-N101265; a Century International Arms, Model M70AB2T, 7.62mm rifle, serial number AB2T-N101795; a Century International Arms, Model M70AB2T, 7.62mm rifle, serial number AB2T-N102159; a Century International Arms, Model WASR 10, 7.62mm rifle, serial number 1970BT3396; and a Century International Arms, Model AKMS, 7.62mm rifle, serial number

KMS00992; in that defendant **ELIDA MIRELES** falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that defendant **ELIDA MIRELES** was the actual buyer of the firearms described above, when in truth and fact, defendant **ELIDA MIRELES** knew that those statements and representations were false and that defendant **ELIDA MIRELES** was not the actual buyer of the firearms.

In violation of Title 18, United States Code, Section 924(a)(1)(A).

**Count Eight**

From on or about January 2, 2011, to on or about January 26, 2011, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**ELIDA MIRELES**

knowingly made a false statement with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory of McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Century International Arms, Model WASR 10, 7.62mm rifle, serial number 1966RS0352; and a Century International Arms, Model WASR 10, 7.62mm rifle, serial number 1984PF7534 in that defendant **ELIDA MIRELES** falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473 that defendant **ELIDA MIRELES** was the actual buyer of the firearms described above, when in truth and fact, defendant **ELIDA MIRELES** knew that those statements and representations were false and that defendant **ELIDA MIRELES**, was not the actual buyer of the firearms.

In violation of Title 18, United States Code, Section 924(a)(1)(A).

**Count Nine**

From on or about February 1, 2011, to on or about February 9, 2011, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

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**ELIDA MIRELES**

knowingly made a false statement with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory of McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Century International Arms, Model WASR 10, 7.62mm rifle, serial number 1971DG3036; a Century International Arms, Model AKMS, 7.62mm rifle, serial number KMS00476; and a Century International Arms, Model M70AB2T, 7.62mm rifle, serial number AB2-05015 in that defendant **ELIDA MIRELES**, who falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that defendant **ELIDA MIRELES** was the actual buyer of the firearms described above, when in truth and fact, defendant **ELIDA MIRELES** knew that those statements and representations were false and that defendant **ELIDA MIRELES** was not the actual buyer of the firearms.

In violation of Title 18, United States Code, Section 924(a)(1)(A).

**Count Ten**

From on or about April 2, 2011, to on or about April 29, 2011, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**RAMIRO ARREDONDO SALINAS**  
**and**  
**ELIZABETH AGUILAR**

knowingly made, and aided and abetted the making of a false statement with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory of McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Century International Arms, Model WASR 10, 7.62mm rifle, serial number 1971DG4150; a Century International Arms, Model WASR 10, 7.62mm rifle, serial number 1966UV3819; a Century International Arms, Model WASR 10, 7.62mm rifle, serial number 1969BM0570; and a Century International Arms, Model



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WASR 10, 7.62mm rifle, serial number 1970BU2658 in that the defendant **RAMIRO ARREDONDO-SALINAS** aided and abetted defendant **ELIZABETH AGUILAR**, who falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that defendant **ELIZABETH AGUILAR**, was the actual buyer of the firearms described above, when in truth and fact, the defendant **RAMIRO ARREDONDO-SALINAS** knew that those statements and representations were false and that defendant **ELIZABETH AGUILAR**, was not the actual buyer of the firearms.

In violation of Title 18, United States Code, Section 924(a)(1)(A) and 2.

**Count Eleven**

From on or about April 2, 2011, to on or about April 29, 2011, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**RAMIRO ARREDONDO SALINAS**  
**and**  
**KATIE MAY ZAMORA**

knowingly made, and aided and abetted the making of a false statement with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory of McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Century International Arms, Model AKMS, 7.62mm rifle, serial number KMS00702; an Arsenal, Model SGL21-61, serial number L09128045; a Century International Arms, Model WASR 10, 7.62mm rifle, serial number 1976GU4759; a Century International Arms, Model WASR 10, 7.62mm rifle, serial number 1970BT1968; a Century International Arms, Model WASR 10, 7.62mm rifle, serial number 1970BT4286; and a PTR 91 Incorporated, Model PTR91, .308 caliber rifle, serial number G10416 in that the defendant **RAMIRO ARREDONDO-SALINAS** aided and abetted defendant **KATIE MAY ZAMORA**, who falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form



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4473, that defendant **KATIE MAY ZAMORA**, was the actual buyer of the firearms described above, when in truth and fact, the defendant **RAMIRO ARREDONDO-SALINAS** knew that those statements and representations were false and that defendant **KATIE MAY ZAMORA**, was not the actual buyer of the firearms.

In violation of Title 18, United States Code, Section 924(a)(1)(A) and 2.

**Count Twelve**

From on or about May 4, 2011, to on or about May 12, 2011, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**RAMIRO ARREDONDO SALINAS**  
**and**  
**KATIE MAY ZAMORA**

knowingly made, and aided and abetted the making of a false statement with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory of McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a PTR 91 Incorporated, Model PDW, .308 caliber pistol, serial number DK0459; a PTR 91 Incorporated, Model PTR91; .308 caliber rifle, serial number GI0383; and a Barret, Model 82A1, serial number AA000547 in that the defendant **RAMIRO ARREDONDO-SALINAS** aided and abetted defendant **KATIE MAY ZAMORA**, who falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that defendant **KATIE MAY ZAMORA**, was the actual buyer of the firearms described above, when in truth and fact, the defendant **RAMIRO ARREDONDO-SALINAS** knew that those statements and representations were false and that defendant **KATIE MAY ZAMORA**, was not the actual buyer of the firearms.

In violation of Title 18, United States Code, Section 924(a)(1)(A) and 2.

**Count Thirteen**

On or about November 18, 2010, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**RAMIRO ARREDONDO SALINAS**  
**and**  
**FRANCIS ANAHI RUBIO**

knowingly made, and aided and abetted the making of a false statement with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory of McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Century International Arms, Model WASR 10, 7.62mm rifle, serial number 1971DG0044 in that defendant **RAMIRO ARREDONDO-SALINAS** aided and abetted defendant **FRANCIS ANAHI RUBIO**, who falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that defendant **FRANCIS ANAHI RUBIO**, was the actual buyer of the firearm described above, when in truth and fact, the defendant **RAMIRO ARREDONDO-SALINAS** knew that those statements and representations were false and that defendant **FRANCIS ANAHI RUBIO**, was not the actual buyer of the firearm.

In violation of Title 18, United States Code, Section 924(a)(1)(A) and 2.

**Count Fourteen**

On or about January 13, 2011, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**RAMIRO ARREDONDO SALINAS**  
**and**  
**FRANCIS ANAHI RUBIO**

knowingly made, and aided and abetted the making of a false statement with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory of McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Century International

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Arms, Model WASR 10/63, 7.62mm rifle, serial number 1968BH0657 in that defendant **RAMIRO ARREDONDO-SALINAS** aided and abetted defendant **FRANCIS ANAHI RUBIO**, who falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that defendant **FRANCIS ANAHI RUBIO**, was the actual buyer of the firearm described above, when in truth and fact, the defendant **RAMIRO ARREDONDO-SALINAS** knew that those statements and representations were false and that defendant **FRANCIS ANAHI RUBIO**, was not the actual buyer of the firearm.

In violation of Title 18, United States Code, Section 924(a)(1)(A) and 2.

**Count Fifteen**

On or about February 1, 2011, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**RAMIRO ARREDONDO SALINAS**  
**and**  
**FRANCIS ANAHI RUBIO**

knowingly made, and aided and abetted the making of a false statement with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory of McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Century International Arms, Model WASR 10, 7.62mm rifle, serial number 1969BO3632 in that defendant **RAMIRO ARREDONDO-SALINAS** aided and abetted defendant **FRANCIS ANAHI RUBIO**, who falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that defendant **FRANCIS ANAHI RUBIO**, was the actual buyer of the firearm described above, when in truth and fact, the defendant **RAMIRO ARREDONDO-SALINAS** knew that those statements and representations were false and that defendant **FRANCIS ANAHI RUBIO**, was not the actual buyer of the firearm.

In violation of Title 18, United States Code, Section 924(a)(1)(A) and 2.

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**Count Sixteen**

On or about January 5, 2011, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**RODOLFO RIOS**

knowingly made a false statement with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory of McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Century International Arms, Model AKMS, 7.62mm rifle, serial number KMS00654, in that defendant **RODOLFO RIOS** falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that defendant **RODOLFO RIOS**, was the actual buyer of the firearm described above, when in truth and fact, defendant **RODOLFO RIOS** knew that those statements and representations were false and that defendant **RODOLFO RIOS**, was not the actual buyer of the firearm.

In violation of Title 18, United States Code, Section 924(a)(1)(A).

**Count Seventeen**

On or about February 3, 2011, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**RODOLFO RIOS**

knowingly made a false statement with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory of McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Century International Arms, Model M70AB2, 7.62mm rifle, serial number AB2-04947, in that defendant **RODOLFO RIOS** falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that defendant **RODOLFO RIOS**, was the actual buyer of the firearm described above, when in truth and fact, defendant **RODOLFO RIOS** knew

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that those statements and representations were false and that defendant **RODOLFO RIOS**, was not the actual buyer of the firearm.

In violation of Title 18, United States Code, Section 924(a)(1)(A).

**Count Eighteen**

From on or about November 16, 2010, to on or about November 29, 2010, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**DEBBIE DEBBLES VELAZQUEZ**

knowingly made a false statement with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory of McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Century International Arms, Model M70AB2, 7.62mm rifle, serial number AB2T- N10102165; and a Century International Arms, Model WASR 10, 7.62mm rifle, serial number 1966AC4142, in that defendant **DEBBIE DEBBLES VELAZQUEZ** falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473 that defendant **DEBBIE DEBBLES VELAZQUEZ** was the actual buyer of the firearms described above, when in truth and fact, defendant **DEBBIE DEBBLES VELAZQUEZ** knew that those statements and representations were false and that defendant **DEBBIE DEBBLES VELAZQUEZ** was not the actual buyer of the firearms.

In violation of Title 18, United States Code, Section 924(a)(1)(A).

**Count Nineteen**

From on or about December 8, 2010, to on or about December 27, 2010, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**DEBBIE DEBBLES VELAZQUEZ**

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knowingly made a false statement with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory of McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Century International Arms, Model WASR 10, 7.62mm rifle, serial number 1985PO5021; a Century International Arms, Model WASR 10, 7.62mm rifle, serial number 1966UV4458; and a Century International Arms, Model M70AB2, 7.62mm rifle, serial number AB2T-N101300, in that defendant **DEBBIE DEBBLES VELAZQUEZ** falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that defendant **DEBBIE DEBBLES VELAZQUEZ**, was the actual buyer of the firearms described above, when in truth and fact, defendant **DEBBIE DEBBLES VELAZQUEZ** knew that those statements and representations were false and that defendant **DEBBIE DEBBLES VELAZQUEZ**, was not the actual buyer of the firearms.

In violation of Title 18, United States Code, Section 924(a)(1)(A).

**Count Twenty**

On or about January 26, 2011, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**DEBBIE DEBBLES VELAZQUEZ**

knowingly made a false statement with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory of McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Century International Arms, Model WASR 10, 7.62mm rifle, serial number 1972EG2624, in that defendant **DEBBIE DEBBLES VELAZQUEZ** falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that defendant **DEBBIE DEBBLES VELAZQUEZ** was the actual buyer of the firearms described above, when in truth and fact, defendant **DEBBIE DEBBLES VELAZQUEZ** knew that those statements and representations

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were false and that defendant **DEBBIE DEBBLES VELAZQUEZ** was not the actual buyer of the firearms.

In violation of Title 18, United States Code, Section 924(a)(1)(A).

**Count Twenty-One**

On or about February 7, 2011, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**DEBBIE DEBBLES VELAZQUEZ**

knowingly made a false statement with respect to information required to be kept in the records of Erick Ford Kruger d/b/a The Armory of McAllen, Texas, a federally licensed firearms dealer, in connection with the acquisition of a Century International Arms, Model M70AB, 7.62mm rifle, serial number AB2-206195, in that defendant **DEBBIE DEBBLES VELAZQUEZ** falsely represented on the Bureau of Alcohol, Tobacco, and Firearms Form 4473, that defendant **DEBBIE DEBBLES VELAZQUEZ** was the actual buyer of the firearm described above, when in truth and fact, defendant **DEBBIE DEBBLES VELAZQUEZ** knew that those statements and representations were false and that defendant **DEBBIE DEBBLES VELAZQUEZ** was not the actual buyer of the firearm.

In violation of Title 18, United States Code, Section 924(a)(1)(A).

A TRUE BILL

FOREPERSON

KENNETH MAGIDSON  
UNITED STATES ATTORNEY

  
ASSISTANT UNITED STATES ATTORNEY